



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM EDWARD DICK, JR.,

Defendant.

No. 8:22-cr-00060-CJC

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(c): Distribution of
Fentanyl Resulting in Death; 21
U.S.C. §§ 841(a)(1), (b)(1)(C)
Possession with Intent to
Distribute Fentanyl; 18 U.S.C.
§ 924(c)(1)(A)(i): Possession of a
Firearm in Furtherance of a Drug
Trafficking Crime; 21 U.S.C.
§ 853, 18 U.S.C. § 924(d)(1), and
28 U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(c)]

On or about October 24, 2021, in Orange County, within the
Central District of California, defendant WILLIAM EDWARD DICK, JR.,
knowingly and intentionally distributed N-phenyl-N-[1-(2-
phenylethyl)-4-piperidinyl] propanamide ("Fentanyl"), a Schedule II
narcotic drug controlled substance, to S.H., A.A., and D.A., each of

1 whose death and serious bodily injury resulted from the use of such
2 substance.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(c)]

On or about October 28, 2021, in Orange County, within the Central District of California, defendant WILLIAM EDWARD DICK, JR. knowingly and intentionally possessed with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("Fentanyl"), a Schedule II narcotic drug controlled substance.

COUNT THREE

[18 U.S.C. § 924(c) (1) (A) (i)]

On or about October 28, 2021, in Orange County, within the Central District of California, defendant WILLIAM EDWARD DICK, JR. knowingly possessed a firearm, namely, a .22 caliber AR-style pistol, bearing no serial number (commonly referred to as a "ghost gun") in furtherance of a drug trafficking crime, namely, possession with intent to distribute fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(c), as charged in Count Two of this Indictment.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in Counts One and Two of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense;

(c) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), any defendant so convicted, shall forfeit substitute property if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Count Three of this Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the convicted defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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substantially diminished in value; or (e) has been commingled with
other property that cannot be divided without difficulty.

A TRUE BILL

/s/

Foreperson

TRACY L. WILKISON
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